

# Exhibit I

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

LINDA ZIMMERMAN, AN INDIVIDUAL,	)	CERTIFIED ORIGINAL
PLAINTIFF,	)	CASE NO. BC720153
VS.	)	VOLUME II
AUTOZONE INC., ET AL.,	)	
DEFENDANTS.	)	
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VIDEOTAPED DEPOSITION OF WILLIAM LONGO, PH.D.

MAY 12, 2020

SUWANEE, GEORGIA

JOB NO. 300655  
REPORTED BY KRISTIN VARGAS, CSR NO. 11908, RPR

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2 FOR THE COUNTY OF LOS ANGELES  
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5 LINDA ZIMMERMAN, AN )  
6 INDIVIDUAL, )  
7 PLAINTIFF, ) CASE NO. BC720153  
8 VS. )  
9 AUTOZONE INC., ET AL., )  
10 DEFENDANTS. )  
10 \_\_\_\_\_)

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13 DEPOSITION OF WILLIAM LONGO, PH.D., THE WITNESS, TAKEN  
14 REMOTELY ON BEHALF OF THE DEFENDANTS, AT SUWANEE, GEORGIA,  
15 ON TUESDAY, MAY 12, 2020, AT 7:11 A.M., BEFORE KRISTIN  
16 VARGAS, CSR NO. 11908, RPR.

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1 me that PLM then is going to have trouble resolving  
2 chrysotile in that Chinese talc without your heavy  
3 liquid separation at very low concentrations?

4 A At very low concentrations, that would be  
5 correct. You would have to define what very low  
6 concentrations are. At a concentration of what was  
7 found in Titley, it does not have a problem using our  
8 system.

9 Q What do you mean by your system?

10 A Well, we have an enhanced objective lens that  
11 gives you better resolution to discriminate between the  
12 fibers and it gives better resolution on the dispersion  
13 staining. And we have the high definition monitor that  
14 allows you to increase the size and be able to adjust  
15 your focus a little bit easier.

16 On a regular PLM setup with a PLM analyst  
17 that's not experienced in looking at this, he may never  
18 find it. Maybe at the concentration we found, but I  
19 don't know.

20 Q So would you agree that at least for Coalinga  
21 type chrysotile, the PLM procedure is not reliable for  
22 confirming chrysotile asbestos in a sample, whether it's  
23 a bulk building product or even something like a talc  
24 without doing your heavy liquid separation technique?

25 A No, I won't agree with that. If you're

1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) ss.  
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4 I, Kristin Vargas, Certified Shorthand Reporter,  
5 Certificate No. 11908 do hereby certify:

6 That prior to being examined, the witness named in the  
7 foregoing deposition was by me duly sworn to testify to the  
8 truth, the whole truth, and nothing but the truth;

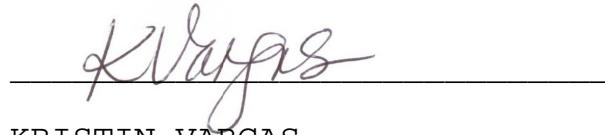
9 That said deposition was taken down by me in shorthand  
10 at the time and place therein named and thereafter reduced  
11 to typewriting under my direction, and the same is a true,  
12 correct, and complete transcript of said proceedings;

13 That if the foregoing pertains to the original  
14 transcript of a deposition in a Federal Case, before  
15 completion of the proceedings, review of the transcript  
16 { } was { } was not required.

17 I further certify that I am not interested in the event  
18 of the action.

19

20 Witness my hand this 15th day of MAY, 2020.

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23 KRISTIN VARGAS  
24 Certified Shorthand Reporter  
for the State of California  
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